UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

RICKY R. FRANKLIN,

Plaintiff,

Case No. 1:21-cv-02075-SDG

v.

Honorable Judge: Steven D. Grimberg

HOLLIS COBB ASSOCIATES, INC.,

Defendant.

DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

Defendant, HOLLIS COBB ASSOCIATES, INC., ("HCA"), by and through its undersigned attorneys, pursuant to Federal Rule of Civil Procedure 56 and Local Rule 56.1, hereby moves that summary judgment be entered in its favor and against Plaintiff as to all claims asserted in the Complaint. In support of its Motion, Defendant incorporates by reference the arguments made and the authorities cited in its Memorandum of Law in Support of its Motion for Summary Judgment filed contemporaneously with this Motion.

WHEREFORE, Defendant, HOLLIS COBB ASSOCIATES, INC., requests that this Court enter an Order granting summary judgment in Defendant's favor and against Plaintiff on all claims asserted in the Complaint and that judgment be entered pursuant to Federal Rule of Civil Procedure 56.

Respectfully submitted,

HOLLIS COBB ASSOCIATES, INC., Defendant

By: Its Attorneys

/s/ Paul Buschmann

Paul Buschmann, Esq. GA Bar No. 098430 HINSHAW & CULBERTSON LLP One East Broward Blvd., Suite 1010 Ft. Lauderdale, FL 33301

Phone: 954-375-1134 Facsimile: 954-467-1024

e-mail: pbuschmann@hinshawlaw.com

Dated: February 7, 2022

CERTIFICATE OF SERVICE

I, Paul Buschmann, hereby certify that on this 7th day of February, 2022, I electronically filed the foregoing, **DEFENDANT'S MOTION FOR SUMMARY JUDGMENT** with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all parties of record.

/s/ Paul Buschmann
Paul Buschmann